

United States Bankruptcy Court
Middle District of Georgia, Macon Division

IN RE:

Case No. 5:18-bk-51888

Worthy, Crystal Nasha

Debtor(s)/Movant(s)

Chapter 7

v.

WORLD FINANCE CORPORATION

Respondent

MOTION TO AVOID LIEN

The debtor(s)/movant(s) in the above-styled action and under the authority of the United States Bankruptcy Code, Section 522(f), moves the court for an order as follows:

1.

The debtor(s) filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code on October 2, 2018.

2.

The respondent, **WORLD FINANCE CORPORATION**, is the holder of a non-possessory, non-purchase money security interest in and (i) household furnishings, household goods, wearing apparel, appliances, books, animals, crops, musical instruments, or jewelry that are held primarily for the personal, family or household use of the debtor or a dependent of the debtor; (ii) implements, professional books, or tools, of the trade of the debtor or the trade of a dependent of the debtor; or (iii) professionally prescribed health aids of the debtor or a dependent of the debtor.

3.

There is no excess equity in any of the items that are subject to this lien that are not otherwise exemptible. Therefore, this lien impairs the exemptions to which the debtor is entitled in this proceeding and the court should avoid the fixing of such lien on such property.

Wherefore, the debtor prays that the court consider this matter and that the Motion to Avoid Lien of **WORLD FINANCE CORPORATION** be granted.

Respectfully Submitted,

/s/ Julius King

Julius King LLC, P. O. Box 35, Bonaire GA 31005, State Bar No. 420990, 478-745-8490 phone, 855-828-9867 fax,
attorneyjuliusking@yahoo.com

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NOTICE OF MOTION

DEBTOR/MOVANT HAS FILED DOCUMENTS WITH THE COURT TO AVOID LIEN.

YOUR RIGHTS MAY BE AFFECTED.

You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one. If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion [or other type of pleading] may be obtained upon written request to counsel for the Movant (identified below) or at the Clerk's office.

If you do not want the court to avoid the lien, or if you want the court to consider your views on the the motion, then you or your attorney shall file with the court a written objection or response on or before 02/13/2019. If you are receiving this notice by mail, you may add 3 days to the response date stated above. The objection or response should be sent to:

[Clerk, U. S. Bankruptcy Court

Middle District of Georgia

P. O. Box 1957

Macon, Georgia 31202]

OR

[Clerk, U. S. Bankruptcy Court

Middle District of Georgia

P. O. Box 2147

Columbus, Georgia 31902]

If an objection or response is filed, a hearing on the Motion To Avoid Lien shall be held on:

02/27/2019 AT 9:30 AM. at Thomas Jefferson Federal Building, 433 Cherry Street, Macon, Georgia 31201

COURTROOM B.

If you mail your response or objection to the court for filing, you shall send it early enough so the court will **receive** the objection or response on or before the response date stated above.

Any response or objection shall also be served on the movant.

If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting relief.

This notice is sent by the undersigned pursuant to LBR 9007-1.

Dated this January 23, 2019

Julius King, Julius King LLC, P O Box 35, Bonaire, GA 31005, SB#420990, 478-745-8490 phone, 1-855-828-9867 fax, attorneyjuliusking@yahoo.com

END OF DOCUMENT

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Motion to Avoid Lien and Notice will be served electronically by the Court's CM/ECF system on the following:

WALTER KELLEY, Chapter 7 Trustee

I hereby further certify that on January 23, 2019, a copy of the Motion to Avoid Lien and Notice were also mailed first class mail, postage prepaid to:

WORLD FINANCE CORPORATION, 2640 METROPOLITAN PKWY SW, ATLANTA, GA 30315-7902

/s/Julius King

Julius King, LLC

P. O. Box 35, Bonaire GA 31005, State Bar No. 420990, 478-745-8490 phone, 855-828-9867 fax, attorneyjuliusking@yahoo.com